

VR/MAG

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	:	CHAPTER 13
WILLIAM F. STANLEY,	:	
a/k/a WILLIAM FREDERICK STANLEY,	:	CASE NO. 5:19-03897
a/k/a WILLIAM STANLEY, and	:	
LORI ANN STANLEY,	:	
a/k/a LORI A. STANLEY,	:	
a/k/a LORI STANLEY,	:	
Debtors	:	

MOTION FOR ORDER TO AMEND CHAPTER 13 PLAN  
AFTER CONFIRMATION

The Motion of the above-named Debtors allege:

1. Debtors' Chapter 13 Plan was confirmed on December 23, 2019.
2. Debtors desire to amend Debtors' Chapter 13 Plan in order to account for the anticipated modification of the Debtors' mortgage eliminating the need to pay additional amounts to Mr. Cooper/Nationstar for pre-petition and post-petition mortgage arrears.
3. By reason of the foregoing, Debtors propose that pursuant to Section 1329(a) of the Bankruptcy Code, Debtors' Chapter 13 Plan be modified as set forth in the attached proposed Third Amended Chapter 13 Plan.

WHEREFORE, Debtors pray that this Motion be granted and that Debtors' Chapter 13 Plan be modified, as set forth in this Motion.

Dated: April 6, 2022

NEWMAN WILLIAMS, P.C.

By: /s/ Vincent Rubino

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